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CAPLIN & DRYSDALE, CHARTERED
James P. Wehner (admitted *pro hac vice*)
Jeffrey A. Liesemer (admitted *pro hac vice*)
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Co-Counsel for the Official Committee of Asbestos Claimants

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:	:	
DURO DYNE NATIONAL CORP., <i>et al.</i> , ¹	:	Chapter 11
Debtors.	:	Case No. 18-27963-MBK
	:	(Jointly Administered)
	:	

**NINETEENTH MONTHLY FEE STATEMENT OF
CAPLIN & DRYSDALE, CHARTERED FOR THE PERIOD
FROM MAY 1, 2020, THROUGH MAY 31, 2020**

Caplin & Drysdale, Chartered (“**Caplin & Drysdale**” or the “**Applicant**”), counsel for the Official Committee of Asbestos Claimants (the “**Committee**”), hereby submits this nineteenth monthly fee statement² for the period commencing May 1, 2020, through May 31, 2020 (the “**Nineteenth Fee Statement**”) pursuant to the *Administrative Fee Order Establishing Certain Procedures for Allowance of Interim Compensation and Reimbursement of Expenses of Professionals Retained by Order of this Court*, dated December 18, 2018 (Docket No. 345) (the “**Interim Compensation Order**”).

¹ The “**Debtors**” in these chapter 11 cases, along with the last four digits of each Debtor’s tax identification number, are Duro Dyne National Corp. (4664), Duro Dyne Machinery Corp. (9699), Duro Dyne Corporation (3616), Duro Dyne West Corp. (5943), and Duro Dyne Midwest Corp. (4662).

² Caplin & Drysdale’s first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Caplin & Drysdale, Chartered for Allowance of Fees and Reimbursement of Expenses* on December 14, 2018 (Docket No. 337).

Pursuant to the Interim Compensation Order, responses to the Nineteenth Fee Statement, if any, are due by July 6, 2020.

Dated: June 26, 2020

By: /s/ James P. Wehner

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*Counsel to the Official Committee
of Asbestos Claimants*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

D.N.J. LBR 2016-1, FEE APPLICATION COVER SHEET

Debtor: Duro Dyne National Corp., et al.¹ Applicant: Caplin & Drysdale, Chartered
Case No.: 18-27963 (MBK) Client: Official Committee of
Asbestos Claimants
Chapter: 11 Case Filed: September 7, 2018

**COMPLETION AND SIGNING OF THIS FORM CONSTITUTES A CERTIFICATION
UNDER PENALTY OF PERJURY, PURSUANT TO 28 U.S.C. SECTION 1746**

RETENTION ORDER(S) ATTACHED AS EXHIBIT B

**NINETEENTH MONTHLY FEE STATEMENT² OF
CAPLIN & DRYSDALE, CHARTERED FOR THE PERIOD
FROM MAY 1, 2020, THROUGH MAY 31, 2020**

**SECTION 1
FEE SUMMARY**

	<u>FEES</u>	<u>EXPENSES</u>
TOTAL PREVIOUSLY REQUESTED	<u>\$1,774,734.25</u>	<u>\$32,660.05</u>
TOTAL ALLOWED TO DATE	<u>\$1,740,993.75</u>	<u>\$32,061.98</u>
TOTAL RETAINER (IF APPLICABLE)	<u>\$0.00</u>	<u>\$0.00</u>
TOTAL HOLDBACK (IF APPLICABLE)	<u>\$6,748.10</u>	<u>\$0.00</u>
TOTAL RECEIVED BY APPLICANT	<u>\$1,740,993.75</u>	<u>\$32,061.98</u>
 FEE TOTALS – PAGE 2	 <u>\$19,813.00</u>	
DISBURSEMENTS TOTALS – PAGE 3	<u>\$1.58</u>	
TOTAL FEE APPLICATION	<u>\$19,814.58</u>	
MINUS 20% HOLDBACK	<u>\$3,962.60</u>	
AMOUNT SOUGHT AT THIS TIME	<u>\$15,851.98</u>	

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² Caplin & Drysdale’s first monthly fee statement was also filed as an interim fee application under the title *First Interim Fee Application of Caplin & Drysdale, Chartered for Allowance of Fees and Reimbursement of Expenses* on December 14, 2018 (Docket No. 337).

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED	HOURS	RATE	FEES
James P. Wehner, Member	1995	6.1	\$795	\$4,849.50
Jeffrey A. Liesemer, Member	1993	13.1	\$795	\$10,414.50
Kevin M. Davis, Of Counsel	2010	3.3	\$560	\$1,848.00
Cecilia Guerrero, Paralegal	N/A	4.3	\$340	\$1,462.00
Brigette A. Wolverton, Paralegal	N/A	4.2	\$295	\$1,239.00
TOTAL FEES		31.0		\$19,813.00
ATTORNEY BLENDED RATE			\$639.13	

SECTION II
SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	Fee
(.01) Asset Analysis and Recovery	0.0	\$0.00
(.03) Business Operations	0.4	\$318.00
(.04) Case Administration	0.3	\$102.00
(.05) Claims Administration and Objections	0.0	\$0.00
(.07) Fee Applications-Self	5.1	\$1,776.00
(.09) Financing	0.0	\$0.00
(.10) Litigation	0.0	\$0.00
(.11) Plan and Disclosure Statement	21.5	\$16,317.00
(.12) Relief from Stay Proceedings	0.0	\$0.00
(.13) Tax Issues	0.0	\$0.00
(.15) Committee Meetings/Conferences	0.0	\$0.00
(.16) Travel Time	0.0	\$0.00
(.17) Docket Review & File Maintenance	2.0	\$590.00
(.18) Fee Applications-Others	1.6	\$680.50
(.19) Retention Applications-Others	0.1	\$29.50
(.20) Retention Applications-Self	0.0	\$0.00
(.22) Review Fee Application-Other Parties	0.0	\$0.00
SERVICE TOTALS:	31.0	\$19,813.00

SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
Computer Assisted Legal Research	\$0.00
Conference Call Charges	\$0.00
Courier & Express Carriers	\$0.00
Court Reporting	\$0.00
Fax	\$0.00
Filing Fees	\$0.00
Other Research	\$0.00
Pacer Fees	\$0.00
Postage	\$0.00
Reproduction Services - In-house	\$0.00
Reproduction Services - Outside	\$0.00
Travel	\$0.00
Other (specify): eDiscovery	\$1.58
DISBURSEMENTS TOTAL:	\$1.58

SECTION IV CASE HISTORY

(NOTE: Items 3 - 6 are not applicable to applications under 11 U.S.C. § 506)

- (1) DATE CASE FILED: September 7, 2018
- (2) CHAPTER UNDER WHICH CASE WAS COMMENCED: 11
- (3) DATE OF RETENTION: November 8, 2018, effective as of September 26, 2018 [Docket No. 258]. *See Order attached.*
- (4) SUMMARIZE IN BRIEF THE BENEFITS TO THE ESTATE AND ATTACH SUPPLEMENTS AS NEEDED:
 - a) Caplin & Drysdale analyzed issues related to the Plan and Plan documents, including revisions of Plan documents;
 - b) Caplin & Drysdale implemented resolutions of Plan objections;
 - c) Caplin & Drysdale prepared and filed fee applications;
 - d) Caplin & Drysdale assisted in the preparation of fee applications for other Committee professionals;
 - e) Caplin & Drysdale spent time working with counsel for the other Plan proponents and internally on general case matters, and status issues, as well as organizing and maintaining the case filing system and docket review for the bankruptcy case;

f) Caplin & Drysdale performed other professional services as counsel for the Committee as necessary and appropriate in these chapter 11 cases.

(5) ANTICIPATED DISTRIBUTION TO CREDITORS:

- (A) ADMINISTRATION EXPENSES: (unknown at this time)
- (B) SECURED CREDITORS: (unknown at this time)
- (C) PRIORITY CREDITORS: (unknown at this time)
- (D) GENERAL UNSECURED CREDITORS: (unknown at this time)

(6) FINAL DISPOSITION OF CASE AND PERCENTAGE OF DIVIDEND PAID TO CREDITORS (IF APPLICABLE): Final disposition of case and dividend are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: June 26, 2020

/s/ James P. Wehner
Signature

EXHIBIT A



One Thomas Circle NW, Suite 1100
Washington, DC 20005
Federal Tax I.D. No.: 52-1226629
www.capdale.com

Telephone: (202) 862-5000

Fax: (202) 429-3301

Official Committee of Asbestos Claimants of Duro Dyne National

Invoice #: 327910
Page: 1

RE: Duro Dyne Bankruptcy

For Professional Services Rendered Through May 31, 2020

Total Services	\$19,813.00
Total Disbursements	\$1.58
Total Current Charges	\$19,814.58

Remittance Advice

Payment is due upon receipt. If you should have any questions, please email accounting@capdale.com.

Check Payable To:

Caplin & Drysdale, Chartered
Attn: Accounts Receivable
One Thomas Circle NW, Suite 1100
Washington, DC 20005

Wire Transfer:

Receiving Bank: Bank of America
ABA Wire Routing Number: 026009593
ABA ACH Routing Number: 054001204
Swift Code: BOFAUS3N
Beneficiary: Caplin & Drysdale, Chartered
Account Number: 001920814809

Credit Card:

We accept American Express. A service fee of 2.4% for Corporate Cards and 2.95% for Individual Cards will be added to all payments.
Please return this remittance page with your payment. Thank you.



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Fax: (202) 429-3301

Official Committee of Asbestos Claimants of Duro Dyne National

June 26, 2020

Invoice #: 327910

Page: 1

RE: Duro Dyne Bankruptcy

For Professional Services Rendered Through May 31, 2020

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.03 Business Operations					
5/11/2020	JAL	Review of correspondence from J. Sinclair and JPW re Debtors' financials (0.1); review and analysis of debtors' motion for second amended order re ordinary course professionals (0.3).	0.4	\$795.00	\$318.00
			Total	0.40	\$318.00
.04 Case Administration & Calendar Control					
5/1/2020	CG	Update docketing calendar.	0.2	\$340.00	\$68.00
5/26/2020	CG	Update docketing calendar.	0.1	\$340.00	\$34.00
			Total	0.30	\$102.00
.07 Fee Applications-Self					
5/8/2020	BAW	Prepare materials re C&D fee application.	0.2	\$295.00	\$59.00
5/8/2020	CG	Review and revise monthly fee application.	0.8	\$340.00	\$272.00
5/11/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
5/11/2020	CG	Review communication re fee applications; communication w/ JPW re same.	0.1	\$340.00	\$34.00
5/14/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
5/15/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/18/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/19/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.07 Fee Applications-Self					
5/22/2020	CG	Review and revise monthly (.7); email JPW re same (.1); email local counsel re same (.1).	0.9	\$340.00	\$306.00
5/26/2020	JPW	Review monthly fee app.	0.3	\$795.00	\$238.50
5/26/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
5/26/2020	CG	Review, revise, and finalize monthly fee app (.5); emails to JPW re same (.1); email to local counsel re same (.1).	0.7	\$340.00	\$238.00
5/28/2020	BAW	Prepare materials re C&D monthly fee application.	0.1	\$295.00	\$29.50
5/28/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/28/2020	CG	Review communications re interim fee app hearing and update materials re same.	0.2	\$340.00	\$68.00
				Total	5.10
					\$1,776.00
.11 Plan & Disclosure Statement					
5/1/2020	JAL	Telephone call with E. Grim re comments on NR settlement motion.	0.1	\$795.00	\$79.50
5/4/2020	JAL	Email correspondence with J. Prol re comments on NR settlement motion (0.3); telephone call with KMD re plan issue (0.2).	0.5	\$795.00	\$397.50
5/4/2020	JPW	Review draft motion (0.8); emails re confirmation issues (0.4).	1.2	\$795.00	\$954.00
5/6/2020	JAL	Revisions and editing to motion to approve NR settlement (0.6); review of markup of draft motion to approve NR settlement and email correspondence to JPW, E. Grim, Debtors' counsel, and FCR's counsel re same (0.5).	1.1	\$795.00	\$874.50
5/6/2020	JPW	Emails re draft settlement motion.	0.5	\$795.00	\$397.50
5/7/2020	JAL	Email correspondence (3x) with J. Prol and Plan Proponent group re NR settlement motion and next steps (0.3); telephone call with JPW re next steps re NR settlement motion (0.1).	0.4	\$795.00	\$318.00
5/7/2020	JPW	Emails re confirmation issues.	0.4	\$795.00	\$318.00
5/11/2020	JPW	Emails re financial analysis, settlement.	0.3	\$795.00	\$238.50
5/12/2020	JAL	Review of J. Sinclair's financial analysis relating to plan confirmation.	0.6	\$795.00	\$477.00
5/15/2020	JPW	Review recent filings.	0.3	\$795.00	\$238.50
5/22/2020	JPW	Emails re revised creditor agreement (0.3); review revised creditor agreement (0.9).	1.2	\$795.00	\$954.00
5/26/2020	JAL	Review and analysis of BoA's markups of exit loan docs and intercreditor agreement.	4.6	\$795.00	\$3,657.00
5/26/2020	JPW	Emails re confirmation documents (0.5); review confirmation documents (0.5).	1.0	\$795.00	\$795.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.11 Plan & Disclosure Statement					
5/27/2020	JAL	Email correspondence with C. Gear re BoA markups of exit loan docs.	0.3	\$795.00	\$238.50
5/29/2020	JAL	Correspondence with J. Fialcowitz re insurance settlement motion pending for next week's hearing (0.2); analysis of issues relating to BoA lending documents in prep for call with FCR counsel (1.4); teleconference with C. Gear and KMD re comments on BoA's markup of loan and intercreditor agreements (1.0); drafted and revised correspondence to J. Prol outlining issues and comments on BoA's markups of loan and intercreditor agreements (2.5).	5.1	\$795.00	\$4,054.50
5/29/2020	JPW	Emails re confirmation issues.	0.6	\$795.00	\$477.00
5/29/2020	KMD	Review and comment on intercreditor and loan/security agreements (2.3); discuss same w/ JAL, C Gear (1).	3.3	\$560.00	\$1,848.00
				Total	21.50
					\$16,317.00
.17 Docket Review & File Maintenance					
5/1/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
5/4/2020	BAW	Prepare materials re recent filings (.2); communications re same (.1).	0.3	\$295.00	\$88.50
5/5/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/6/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/7/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/11/2020	BAW	Prepare materials re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/22/2020	BAW	Factual research re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/27/2020	BAW	Factual research re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
5/29/2020	BAW	Factual research re recent filings (.1); communications re same (.1).	0.2	\$295.00	\$59.00
				Total	2.00
					\$590.00
.18 Fee Applications-Others					
5/14/2020	CG	Review COFC monthly fee application.	0.3	\$340.00	\$102.00
5/15/2020	JPW	Review CO monthly.	0.3	\$795.00	\$238.50
5/15/2020	CG	Review and revise COFC monthly fee application (.5); communications w/ COFC re same (.1).	0.6	\$340.00	\$204.00
5/22/2020	CG	Review, revise, and finalize COFC monthly (.3); email local counsel re same (.1).	0.4	\$340.00	\$136.00

SERVICES

Date	Person	Description of Services	Hours	Rate	Amount
.18		Fee Applications-Others	Total	1.60	\$680.50
.19		Retention Applications-Others			
5/11/2020	BAW	Review and compile materials re OCP retention.	0.1	\$295.00	\$29.50
			Total	0.10	\$29.50
		Total Professional Services	31.0		\$19,813.00

PERSON RECAP

Person		Title	Hours	Rate	Amount
JAL	Jeffrey A. Liesemer	Member	13.1	\$795.00	\$10,414.50
JPW	James P. Wehner	Member	6.1	\$795.00	\$4,849.50
KMD	Kevin M. Davis	Of Counsel	3.3	\$560.00	\$1,848.00
CG	Cecilia Guerrero	Paralegal	4.3	\$340.00	\$1,462.00
BAW	Brigette A. Wolverton	Paralegal	4.2	\$295.00	\$1,239.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
05/12/2020	eDiscovery Exp - EPIQ Apr. 2020 [.17]	\$1.58
	Total Disbursements	\$1.58
	Total Services	\$19,813.00
	Total Disbursements	\$1.58
	Total Current Charges	\$19,814.58

EXHIBIT

B



UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
**Caption in Compliance with D.N.J. LBR
9004-1**

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*Proposed Local Counsel for the Official
Committee of Asbestos Claimants*

Order Filed on November 9, 2018
by Clerk
U.S. Bankruptcy Court
District of New Jersey

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: : Chapter 11
DURO DYNE NATIONAL CORP., *et al.*, : Case No. 18-27963 (MBK)
Debtors.¹ : (Jointly Administered)

**[PROPOSED] ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF
CAPLIN & DRYSDALE, CHARTERED, AS THE COMMITTEE'S COUNSEL,
EFFECTIVE *NUNC PRO TUNC* AS OF SEPTEMBER 26, 2018**

The relief set forth on the following pages, numbered two (2) through and including three (3), is hereby **ORDERED**.

DATED: November 9, 2018

A handwritten signature in black ink, appearing to read "Michael B. Kaplan".
Honorable Michael B. Kaplan
United States Bankruptcy Judge

Page: 2
Debtor: Duro Dyne National Corp., et al.
Case No.: 18-27963 (MBK)
Caption: Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective *Nunc Pro Tunc* as of September 26, 2018

Before this Court is the *Application of the Official Committee of Asbestos Claimants for an Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective Nunc Pro Tunc as of September 26, 2018* (the “**Application**”), which was filed by the Official Committee of Asbestos Claimants (the “**Committee**”) on October 29, 2018. Based on the record herein, and after due deliberation thereon, this Court finds and concludes that (i) the law firm of Caplin & Drysdale, Chartered (“**Caplin & Drysdale**”), does not represent any entity having an interest adverse to the Committee or to the asbestos-related creditors of the Debtors’ estates in connection with the matters for which the Committee proposes to employ Caplin & Drysdale; (ii) Caplin & Drysdale is a “disinterested person” pursuant to §§ 101(14) and 328(c) of the Bankruptcy Code; (iii) proper and adequate notice of the Application has been given and no other or further notice is necessary; and (iv) the Committee’s employment and retention of Caplin & Drysdale as its counsel should be approved. Accordingly, **IT IS HEREBY ORDERED**, that:

1. The Application is granted and approved;
2. The Committee is authorized to employ and retain Caplin & Drysdale as its counsel on the terms set forth in the Application, pursuant to §§ 328 and 1103 of the Bankruptcy Code, effective *nunc pro tunc* as of September 26, 2018;
3. Caplin & Drysdale shall be compensated in accordance with the procedures set forth in §§ 330 and 331 of the Bankruptcy Code, the applicable Federal Rules of Bankruptcy Procedure, the orders and rules of this Court, and such other procedures as may be fixed by order of this Court;

Page: 3
Debtor: Duro Dyne National Corp., *et al.*
Case No.: 18-27963 (MBK)
Caption: Order Authorizing the Employment and Retention of Caplin & Drysdale, Chartered, as the Committee's Counsel, Effective *Nunc Pro Tunc* as of September 26, 2018

4. The requirement set forth in Local Rule 9013-1(a)(3) that any motion or other request for relief be accompanied by a memorandum of law is hereby deemed satisfied by the contents of the Application or otherwise waived;
5. This Order shall be immediately effective and enforceable upon its entry; and
6. The Court shall retain jurisdiction with respect to all matters arising or related to the implementation of this order.